

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL WILLIAMSON, THE ESTATE
OF DON C. CRAFT, KIRK O'DONNEL,
JOHN LETTOW, TIMOTHY MCGINNIS,
FRED NEWTON, WILLIAM WATSON,
CHRIS HANCOCK, DALE SCHONEMAN and
INTERNATIONAL DEEP SEA SURVEY, INC.,

**NOTICE OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

06-CV-5724 (LTS)

Plaintiffs,

- against -

RECOVERY LIMITED PARTNERSHIP,
COLUMBUS EXPLORATION, LLC,
COLUMBUS-AMERICA DISCOVERY GROUP,
INC., COLUMBUS EXPLORATION LIMITED
PARTNERSHIP, OMNI ENGINEERING, INC.,
OMNI ENGINEERING OF OHIO, INC., ECONOMIC
ZONE RESOURCE ASSOCIATES, ECONOMIC
ZONE RESOURCE ASSOCIATES, LTD., EZRA,
INC., EZRA OF OHIO, INC., ECON ENGINEERING
ASSOCIATES, INC. DOE.E, INC., THOMAS G.
THOMPSON, GILMAN D. KIRK, JR., JAMES F.
TURNER, MICHAEL J. FORD, JR. and
W. ARTHUR CULLMAN, JR.,,

Defendants.

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PLEASE TAKE NOTICE that pursuant to S.D.N.Y. Local R. 1.3(c) and upon the
annexed declaration of Nicole A. Dyer ("Dyer Declaration") and the affidavit of William M.
Mattes (annexed as Exhibit "A" thereto) and upon all other pleadings and proceedings in this
matter, defendants Recovery Limited Partnership, Columbus Exploration, LLC,
Columbus-America Discovery Group, Inc., Columbus Exploration Limited Partnership, Omni
Engineering, Inc., Omni Engineering of Ohio, Inc., Economic Zone Resource Associates,

Economic Zone Resource Associates, Ltd., EZRA, Inc., Ezra of Ohio, Inc., ECON Engineering Associates, Inc. DOE.E, Inc., Thomas G. Thompson, Gilman D. Kirk, Jr., James F. Turner, Michael J. Ford, Jr. and W. Arthur Cullman, Jr. (collectively "defendants") will move this Court before the Honorable Laura Taylor Swain, United States District Judge, in Room 17C of the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, on the ___ day of October, 2006 at ___ a.m. or as soon thereafter as counsel may be heard, for an Order in the form of the proposed Order annexed as Exhibit "B" to the Dyer Declaration granting the Motion for Admission *Pro Hac Vice* of William M. Mattes so that he may appear for defendants in the above-captioned action.

Plaintiff's counsel, James T. Shirley, Esq., consents to this motion.

Dated: New York, New York
October 20, 2006

Respectfully submitted,

LANDMAN CORSI BALLAINE & FORD P.C.



Nicole A. Dyer (ND 3943)
Local Counsel for Defendants
Thomas G. Thompson, Gilman D. Kirk, Jr.,
James F. Turner, Michael J. Ford, Jr., and
W. Arthur Cullman, Jr.
120 Broadway, 27th Floor
New York, New York 10271
(212) 238-4800

Of Counsel:
DINSMORE & SHOHL LLP
William M. Mattes
175 South Third Street
Columbus, Ohio 43215
(614) 628-6880

TO: James T. Shirley (JTS 6114)
HOLLAND & KNIGHT, LLP
195 Broadway
New York, New York 10007-3189
(212) 513-3200

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL WILLIAMSON, THE ESTATE
OF DON C. CRAFT, KIRK O'DONNEL,
JOHN LETTOW, TIMOTHY MCGINNIS,
FRED NEWTON, WILLIAM WATSON,
CHRIS HANCOCK, DALE SCHONEMAN and
INTERNATIONAL DEEP SEA SURVEY, INC.,

**DECLARATION OF
NICOLE A. DYER**

06-CV-5724 (LTS)

Plaintiffs,

- against -

RECOVERY LIMITED PARTNERSHIP,
COLUMBUS EXPLORATION, LLC,
COLUMBUS-AMERICA DISCOVERY GROUP,
INC., COLUMBUS EXPLORATION LIMITED
PARTNERSHIP, OMNI ENGINEERING, INC.,
OMNI ENGINEERING OF OHIO, INC., ECONOMIC
ZONE RESOURCE ASSOCIATES, ECONOMIC
ZONE RESOURCE ASSOCIATES, LTD., EZRA,
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ASSOCIATES, INC. DOE.E, INC., THOMAS G.
THOMPSON, GILMAN D. KIRK, JR., JAMES F.
TURNER, MICHAEL J. FORD, JR. and
W. ARTHUR CULLMAN, JR.,

Defendants.

-----X

NICOLE A. DYER, an attorney admitted to practice in the Courts of New York, affirms
under penalty of perjury as follows:

1. I am an associate of the law firm of Landman Corsi Ballaine & Ford P.C., 120
Broadway, 27th Floor, New York, NY 10271, which is local counsel for defendants Thomas G.
Thompson, Gilman D. Kirk, Jr., James F. Turner, Michael J. Ford, Jr. and W. Arthur Cullman,
Jr. in the above-captioned action. I make this declaration in support of the Motion for Admission

Pro Hac Vice of William M. Mattes of the law firm Dinsmore & Shohl LLP located in Columbus, Ohio, for the purposes of appearing on behalf of and representing defendants in the above-captioned matter.

2. I am a member in good standing of the Bar of the State of New York as well as the Southern District of New York.

3. Mr. Mattes is a member of good standing of every Bar in which he is licensed to practice law and is not under any suspension or disbarment from any court.

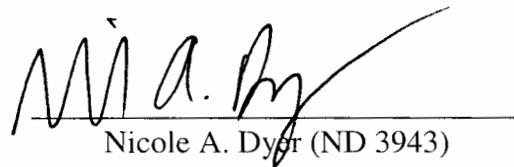
4. The Court is respectfully referred to the Affidavit of William M. Mattes (annexed hereto as Exhibit "A") for a summary of his qualifications and experience.

5. I have every reason to believe that Mr. Mattes will comport himself in accordance with the highest standards of the Bar of this Court.

6. Plaintiff's counsel, James T. Shirley, Esq., consents to this motion.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Dated: New York, New York
October 20, 2006



Nicole A. Dyer (ND 3943)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL WILLIAMSON, THE ESTATE
OF DON C. CRAFT, KIRK O'DONNEL,
JOHN LETTOW, TIMOTHY MCGINNIS,
FRED NEWTON, WILLIAM WATSON,
CHRIS HANCOCK, DALE SCHONEMAN and
INTERNATIONAL DEEP SEA SURVEY, INC.,

AFFIDAVIT OF
WILLIAM M. MATTES

06-CV-5724 (LTS)

Plaintiffs,

- against -

RECOVERY LIMITED PARTNERSHIP,
COLUMBUS EXPLORATION, LLC,
COLUMBUS-AMERICA DISCOVERY GROUP,
INC., COLUMBUS EXPLORATION LIMITED
PARTNERSHIP, OMNI ENGINEERING, INC.,
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ASSOCIATES, INC. DOE.E, INC., THOMAS G.
THOMPSON, GILMAN D. KIRK, JR., JAMES F.
TURNER, MICHAEL J. FORD, JR. and
W. ARTHUR CULLMAN, JR.,

Defendants.

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STATE OF NEW YORK)
)
) ss.:
COUNTY OF)

WILLIAM M. MATTES, being duly sworn, deposes and says:

1. I reside at 67 Indian Springs Drive, Columbus, Ohio 43214.
2. I am a partner with the law firm Dinsmore & Shohl LLP, 175 South Third Street, Columbus, Ohio 43215.

3. I am licensed to practice in the State of Ohio. A certificate of good standing is annexed hereto.

4. I am admitted to appear before the following federal courts:

- (a) United States Court of Appeals for the Sixth Circuit
- (b) United States District Court for the Northern District of Ohio
- (c) United States District Court for the Southern District of Ohio

5. I have been practicing law for approximately 18 years.

6. I have never been held in contempt of court.

7. I have never been censured, suspended or disbarred by any court.



WILLIAM M. MATTES

Dated: Columbus, Ohio
October 18, 2006

Sworn to before me this
day of

Kelly Miller
Notary Public



KELLY MILLER
NOTARY PUBLIC
STATE OF OHIO
Comm. Expires
July 27, 2011

The Supreme Court of Ohio

CERTIFICATE

I, RICHARD A. DOVE, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Attorney Registration Section of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio, **William Michael Mattes** was admitted to the practice of law in Ohio on **November 7, 1988**; has registered as an **active** attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

I further certify that the records of the Clerk's Office of the Supreme Court of Ohio do not indicate that the Board of Commissioners on Grievances and Discipline has filed a report recommending that the Supreme Court impose discipline against Mr. Mattes pursuant to Gov. Bar R. V ("Disciplinary Procedure"). I further certify that the records of the Clerk's Office do not indicate that the Supreme Court has imposed discipline against Mr. Mattes pursuant to Gov. Bar R. V. I further certify that the records of the Clerk's Office do not indicate that a disciplinary matter was or is currently pending against Mr. Mattes with the Supreme Court.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 18th day of October, 2006.

RICHARD A. DOVE

Director, Attorney Services Division

Sebastian Chisick

Manager, Attorney Registration and CLE Section

The Supreme Court of Ohio

C E R T I F I C A T E

I, RICHARD A. DOVE, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Attorney Registration Section of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

William Michael Mattes

was admitted to the practice of law in Ohio on November 07, 1988; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 18th day of October, 2006.

RICHARD A. DOVE

Director, Attorney Services Division

Deborah Christy

Manager, Attorney Registration and CLE Section

AFFIDAVIT OF PERSONAL SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

RYAN NEW, being duly sworn, deposes and says, that deponent is not a party to the action, is over 18 years of age and resides at BROOKLYN, NEW YORK.

That on the 20th day of October, 2006, deponent served the within **NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE** upon:

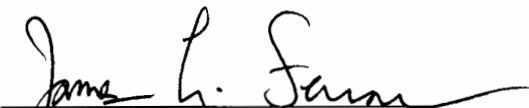
James T. Shirley, Esq.
HOLLAND & KNIGHT, LLP
195 Broadway, 24th Floor
New York, New York 10007-3189

attorneys in this action, at the addresses designated by said attorneys for that purpose by personally delivering a copy of the same and leaving it with a person at that office authorized to receive service of legal papers.



Ryan New

Sworn to before me this
20th day of October, 2006



Notary